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8 Attorneys for Defendants
9 **NISSAN MOTORS CORPORATION IN GUAM**
10 and **TOKIO MARINE AND NICHIDO**
11 **FIRE INSURANCE CO., LTD.**

FILED
DISTRICT COURT OF GUAM
JUL 05 2007 *nba*

MARY L.M. MORAN
CLERK OF COURT

DISTRICT COURT OF GUAM

JEREMY J. CAMACHO

CIVIL CASE NO. 07-00005

12 Plaintiff,

13 vs.

14 UNITED STATES OF AMERICA,
15 NISSAN MOTORS CORPORATION IN
16 GUAM, a Guam Corporation, TOKIO
MARINE AND NICHIDO FIRE
INSURANCE CO., LTD.,

STIPULATION FOR DISMISSAL OF
ACTION AS TO DEFENDANTS
NISSAN MOTORS CORPORATION IN
GUAM and TOKIO MARINE AND
NICHIDO FIRE INSURANCE CO.,
LTD.

17 Defendants.
18 /

19 COMES NOW Plaintiff, JEREMY J. CAMACHO ("CAMACHO"), through
20 counsel, CUNLIFFE & COOK, by Jeffrey A. Cook, Esq., the Defendant UNITED
21 STATES OF AMERICA ("USA"), through counsel, OFFICE OF THE UNITED STATES
22 ATTORNEY, by Mikel W. Schwab, Assistant United States Attorney, and/or Kristin D.
23 St. Peter, Special Assistant United States Attorney, and the Defendants NISSAN
24 MOTORS CORPORATION IN GUAM ("NISSAN MOTORS") and TOKIO MARINE
25 AND NICHIDO FIRE INSURANCE CO., LTD. ("TOKIO MARINE"), through counsel,

ORIGINAL

1 MAHER • YANZA • FLYNN • TIMBLIN, LLP, by Terence E. Timblin, Esq., and hereby
2 stipulate and agree that Plaintiff CAMACHO's claims as to Defendants NISSAN
3 MOTORS and TOKIO MARINE shall be dismissed, pursuant to Rule 41(a)(1)(ii) of
4 Federal Rules of Civil Procedure, the parties herein to bear their own costs.
5

6 Defendants NISSAN MOTORS and TOKIO MARINE shall remain in the case
7 for the sole purpose of stipulating to a remand to the Superior Court of Guam, in the
8 event that Plaintiff CAMACHO's claim should be dismissed solely on a jurisdictional or
9 procedural basis. Should the matter be settled between Plaintiff CAMACHO and
10 Defendant USA or a judgment be entered on the merits, this dismissal shall be final
11 and with prejudice.

12 DATED: 6/18/07

13 CUNLIFFE & COOK
14 A Professional Corporation
15 Attorneys for Plaintiff JEREMY J.
16 CAMACHO

17 By _____
18 JEFFREY A. COOK, ESQ.

DATED: 7/16/07

LEONARDO M. RAPADAS
UNITED STATES ATTORNEY
DISTRICTS OF GUAM AND NMI
Attorney for Defendant
UNITED STATES OF AMERICA

By Kristin D. St. Peter
KRISTIN D. ST. PETER, SPECIAL
ASSISTANT U.S. ATTORNEY

MIKEL W. SCHWAB, ASSISTANT
U.S. ATTORNEY

MAHER•YANZA • FLYNN • TIMBLIN, LLP
Attorney for Defendants NISSAN
MOTORS CORPORATION IN GUAM and
TOKIO MARINE AND NICHIDO FIRE
INSURANCE CO., LTD.

24 DATED: 6/28/07

25 By Terence E. Timblin
TERENCE E. TIMBLIN, ESQ.